

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Greenbelt Division

Farhad Radfar
739 ElmCroit Blvd.
Apt. G202
Rockville, MD 20850

Plaintiff, on behalf of himself and
others similarly situated

v.

ROCKVILLE AUTO GROUP, LLC
17 Fedor Ave.
Gaithersburg, MD 20877

and

TUBA HAMED
8420 Sego Lily Ct.
Lorton, VA 22079

and

ABDULLAH RAZAQ
8420 Sego Lily Ct.
Lorton, VA 22079

Defendants

Case No.: *8:16-cv-03082-GJH*

PLAINTIFF'S MOTION REQUESTING THE COURT GRANT PLAINTIFF'S
MOTION FOR LEAVE TO FILE AN AMENDED COMPLAINT AND
PLAINTIFF'S MOTION TO CONDITIONALLY CERTIFY A COLLECTIVE
ACTION AND TO ISSUE NOTICE

Plaintiff respectfully moves this Court for entry of an Order granting Plaintiff's
Motion For Leave to File an Amended Complaint and Plaintiff's Motion to Conditionally

Certify a Collective Action and to Issue Notice, because Defendants have failed to respond to either of the Plaintiff's motions within the time allowed by law.

On December 22, 2017, Plaintiff filed a Motion For Leave to File an Amended Complaint. On the same date, Plaintiff also filed a Motion to Conditionally Certify a Collective Action and to Issue Notice

Under this Court's Rules, Defendant's were required to respond within 14 days to our Motions "Unless otherwise ordered by the Court, all memoranda in opposition to a motion shall be filed within fourteen (14) days of the service of the motion". Maryland Local Rule 105 (2)(a). This court has not directed any other time for filing. Accordingly, any opposition to the Plaintiff's Motion's was due January 5, 2018. The opposition is now 30 days late. There was no justification for Defendant's failure to file an opposing memorandum. The opposing counsel have not contacted the Plaintiff to ask for extension of time. Consequently, this Court should treat the Motions as conceded.

Respectfully submitted,

Dated: February 5, 2018

By: /s/ Ali Herischi
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